

McKool Smith

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May 18, 2020

VIA ECF

Honorable Esther Salas
United States District Judge, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

RE: *Pharmacia Corp. n/k/a Pfizer Inc. v. Arch Specialty Insurance Co., et al.*,
No. 2:18-cv-00510-ES-MAH (D.N.J.)

Dear Judge Salas:

Pursuant to Your Honor's Order dated March 26, 2020 (D.E. 115, the "March 26 Order"), I am writing on behalf of plaintiff Pharmacia Corporation n/k/a Pfizer Inc. and defendant Twin City Fire Insurance Company to inform Your Honor that the parties' May 11, 2020 Zoom mediation with Jed D. Melnick of JAMS has concluded, and the parties have not settled.

We note that Your Honor's March 26 Order instructed the parties to jointly submit correspondence regarding reinstatement of the matter 120 days from the issuance of the Order (July 24). However, we can conclusively advise that settlement efforts have failed, that the parties desire to reinstate the matter, and, with leave of the Court, would reinstate the pending motions (D.E. Nos. 87 & 89) by filing new notices of motion for summary judgment.

We thank the Court for its attention to this matter and can be available at Your Honor's convenience to address any questions.

Respectfully submitted,

By: s/ Adam S. Ziffer

Adam S. Ziffer

cc: All counsel of record (via ECF)